

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT,) )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. ) 4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al, )

Defendants. )

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VOLUME I OF THE VIDEOTAPED  
30(b)(6) DEPOSITION OF TIMOTHY MAUPIN,  
produced as a witness on behalf of the Plaintiff in  
the above styled and numbered cause, taken on the  
21st day of July, 2008, in the City of Tulsa, County  
of Tulsa, State of Oklahoma, before me, Lisa A.  
Steinmeyer, a Certified Shorthand Reporter, duly  
certified under and by virtue of the laws of the  
State of Oklahoma.

**TULSA FREELANCE REPORTERS**  
**918-587-2878**

**EXHIBIT**

2

1 Q All right. Do you understand you're here as  
2 the company designee to speak for the company on  
3 certain subjects to provide complete knowledgeable  
4 and binding answers on behalf of the company  
5 regarding those subjects identified in the Rule  
6 30(b)(6) notice for deposition, which was served by  
7 the State of Oklahoma on Cargill and Cargill Turkey,  
8 LLC. Do you understand that obligation?

09:10AM

9 A Yes, sir.

10 Q So I ask you -- when I say you or you say I,  
11 that's going to refer to those entities and not you  
12 individually. If at any time you feel that you  
13 cannot speak on behalf of that entity, you need to  
14 identify that and tell us on the Record that you  
15 don't know for that entity but you can speak as an  
16 individual. Can you do so today so we're clear on  
17 our Record?

09:10AM

09:10AM

18 A Yes, sir.

19 Q All right. The period of inquiry for the  
20 notice given to the Cargill entities is from the  
21 date Cargill commenced any poultry growing  
22 operations located within the boundaries of the IRW  
23 until the date of this testimony. Do you understand  
24 that period of inquiry?

09:11AM

25 A Yes.

09:11AM

**TULSA FREELANCE REPORTERS**  
**918-587-2878**

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 16 )

17 TYSON FOODS, INC., et al, )  
 18 )

19 Defendants. )  
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**TULSA FREELANCE REPORTERS**  
**918-587-2878**

1 is that correct?

2 A Yes, that's correct.

3 Q Do you know the names of the persons who own  
4 that company?

5 A Can you restate your question? 10:00AM

6 Q Do you know the names of the persons owning  
7 Cargill, Inc.?

8 A Primarily those shareholders are in the  
9 Cargill and MacMillan families.

10 Q Okay. Do you know how many of those people 10:00AM  
11 there are?

12 A The last number I heard there were 117.

13 Q Okay.

14 MS. GRIFFIN: Rick, this is Jennifer. I'm  
15 going to drop off. They've called in on the other 10:00AM  
16 deposition.

17 MR. GARREN: Okay.

18 MS. GRIFFIN: Thank you.

19 Q When did Cargill first enter the poultry  
20 production business at any location? 10:01AM

21 A I don't think I know the answer to that  
22 question.

23 Q When did Cargill first enter the poultry  
24 production business within the IRW?

25 A I believe that date was in mid 1970's. 10:01AM

**TULSA FREELANCE REPORTERS**  
**918-587-2878**

1 Value Added Meats.

2 Q All right, and when did that name change  
3 occur?

4 A June 1st, 2008.

5 Q And why did that occur, if you know? 10:27AM

6 A The food service area of Cargill Value Added  
7 Meats separated to become its own business unit.

8 Q What kind of legal entity is Cargill Value  
9 Added Meats Retail?

10 A It's only a profit and loss center within the 10:27AM  
11 platform. It's not a legal entity.

12 Q All right. So let's try and get things  
13 organized for me. We start at the top with Cargill,  
14 Inc., and we start at the bottom and we have Cargill  
15 Turkey Production, LLC. I want you to fill in the 10:28AM  
16 blanks in between with regard to the corporate  
17 structure from the LLC to the parent Cargill, Inc.  
18 Is the next structure above Cargill Turkey  
19 Production, LLC, CVAM Retail, Cargill Value Added  
20 Meats retail? 10:28AM

21 MS. HILL: Object to the form.

22 A From an organizational structure standpoint,  
23 that's correct. From a legal entity standpoint,  
24 it's not correct.

25 Q Okay. The legal entity structure then -- what 10:29AM

1 would be the legal entity above Cargill Turkey  
2 Production, LLC?

3 A Cargill Meat Solutions, Incorporated.

4 Q And does Cargill Meat Solutions, Incorporated  
5 own 100 percent of Cargill Turkey Production, LLC? 10:29AM

6 A Yes, to my knowledge it does.

7 Q Does Cargill, Inc., own 100 percent of Cargill  
8 Meat Solutions, Inc.?

9 A Yes, to my knowledge they do.

10 Q Is there any legal entity between Cargill Meat 10:29AM  
11 Solutions, Inc., and Cargill, Inc., in the  
12 structure?

13 A Not to my knowledge.

14 Q All right. Are there any other organizational  
15 structures between Cargill Meat Solutions and 10:30AM  
16 Cargill, Inc.?

17 MS. HILL: Object to the form.

18 A The platform as it now exists is Cargill  
19 Animal Protein. It's not a legal entity but it's a  
20 platform within the business. 10:30AM

21 Q So if I were -- I may be describing this  
22 differently than you perceive and if so, you need to  
23 correct me so I understand it. If I were to look in  
24 the organizational structure, not the legal  
25 structure starting at the bottom with Cargill Turkey 10:30AM